



*MAIS response to  
Reilly proposal to drill & sample W23*

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STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

ADDRESS REPLY TO:  
OFFICE OF THE ATTORNEY GENERAL  
MINNESOTA POLLUTION CONTROL AGENCY  
1835 W. COUNTY ROAD 82  
ROSEVILLE, MINNESOTA 55113  
(612) 286-7342

January 21, 1981

US EPA RECORDS CENTER REGION 5



515824

Edward Schwartzbauer  
Dorsey, Windhorst, Hannaford,  
Whitney & Halladay  
2300 First National Bank Building  
120 So. Sixth Street  
Minneapolis, Minnesota 55402

Re: United States v. Reilly Tar & Chemical Corporation  
Court File No. Civ. 4-80-469  
Reilly Tar Proposal for Investigation of Well W23

Dear Ed:

The Minnesota Pollution Control Agency and the Minnesota Department of Health favor an investigation of well W23 on the former Reilly Tar site to determine the nature of the material which has plugged the well below the 595 foot level. The MPCA and the MDH will not contribute any funds for the investigation. The agencies are prepared to review and comment on a protocol to be developed for the investigation and to send personnel to observe field operations.

In the opinion of the MPCA and MDH, a protocol should address the following considerations:

1. Boring depth. It would be necessary to drill to the original 909 foot depth to determine the nature of all materials in well.
2. Minimize disturbance of coal tar contaminants at the 595 foot level, such as by installing a grout cap on top of the coal tar material.
3. Isolating the upper aquifer from materials liberated by drilling, such as by installing a temporary casing from the top of the well to the 595 foot level.
4. Designation in the protocol of the number and location of samples to be taken and parameters for which analysis will be done. Samples should include water from the Prairie du Chien aquifer both before and after the investigation, and parameters should include the base/neutral and acid fractions for which the MDH and USGS have been analyzing.

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5. Provision of temporary storage for contaminated water from the well and proposal for its ultimate disposal.
6. Appropriate measures after conclusion of the drilling to protect the lower aquifers from coal tar materials liberated as a result of the investigation.

If Reilly Tar will be undertaking this investigation, it should submit a proposal for review by the state agencies and other interested parties. Further technical discussions as to the measures to be employed by the company could then be pursued.

Very truly yours,



STEPHEN SHAKMAN  
Special Assistant  
Attorney General

SS:jb

cc: Roger DeRoos  
David Giese  
Jay Heffern  
Lovell Richie  
Allen Hinderaker  
Thomas K. Berg

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